

# GDPR Policy Statement

## Introduction

The EU General Data Protection Regulation (“GDPR”) came into force across the European Union on 25<sup>th</sup> May 2018. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

Nowadays, there is a broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The GDPR aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

## Our Commitment

Dream Bid Limited, with registered offices at Suite 5106, Unit 1, 77 Sir Rogerson’s Quay, Dublin 2, IRELAND, company registration No 613953 are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

Dream Bid Limited are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and ensure maximum and ongoing compliance.

Dream Bid Limited have a consistent level of data protection and security across our organisation and the measures taken to ensure compliance with the GDPR include:

- **Information Audit** – carrying out company-wide information audits to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed. **Policies & Procedures** – ensuring data protection policies and procedures meet the requirements and standards of the GDPR and any relevant data protection laws, including: –
  - **Data Protection** – Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
  - **Data Retention & Erasure** – we ensure that we meet the ‘data minimisation’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the ‘Right to Erasure’ obligation under the GDPR and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
  - **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
  - **International Data Transfers & Third-Party Disclosures** – where Dream Bid Limited stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those

countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.

- **Subject Access Request (SAR)** – we accommodate the 30-day timeframe for providing the requested information. Our procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.
- **Legal Basis for Processing** –all processing activities are reviewed to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR are met.
- **Privacy Notice/Policy** – Our Privacy Policy complies with the GDPR, ensuring that all individuals whose personal information we processed have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- **Obtaining Consent** –our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information are fully compliant with the GDPR.
- **Data Protection Impact Assessments (DPIA)** – where we process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data; we ensure that we comply fully with the GDPR’s Article 35 requirements. We implement documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).
- **Special Categories Data** – where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

### **Data Subject Rights**

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information of an individual’s right to access any personal information that Dream Bid Limited processes about them and to request information about:

What personal data we hold about them

- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source

- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances